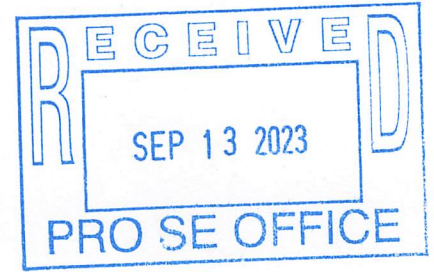


2121 Union Street Apt. 2R
Brooklyn NY 11212
404-246-5772
joyenne1970@hotmail.com



September 12, 2023

Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn NY 11201

Re: Thorne-Long v. City of New York, et al. 23-CV-43055 (DG) (LB)


Dear Judge Gujarati,

I am the Plaintiff in the above-referenced action, appearing pro se.¹ I am writing to request leave to serve and file an Amended Complaint, with a deadline of October 6, 2023. If the Court grants my request, I also ask that Defendants' Motion to Dismiss be held in abeyance.

I seek to amend the complaint to make several significant changes including, but not limited to: eliminating all Defendants except the City of New York and the NYC Department of Education ("DOE"); withdrawal of the cause of action for libel/defamation; inclusion of allegations regarding the fact that I filed a timely notice of claim with the NYC Comptroller, the NYC Law Department, and the DOE, as well as proof that I did so; and inclusion of allegations regarding the fact that I filed an EEOC complaint regarding my termination by the DOE.

Counsel for the Defendants was notified of this request and did not consent, stating that to do so would not be in the best interest of his clients.

Respectfully submitted,


Joanne Thorne-Long

Copy to: Rene Macioce rmacioce@law.nyc.gov

¹ This letter was prepared with help from the City Bar Justice Center's Federal Pro Se Legal Assistance Project.